

I am a current member of the ARRL and have maintained my membership since I was first licensed in 1994. For the last 4 years I have held an appointment as an Official Observer for League and spend a good deal of my radio time monitoring the amateur bands. Empirically, it seems to me that our current band plan is indeed working, and working quite well. While occasional problems do occur, by and large the segregation of the various modes has allowed an orderly coexistence. While I feel that the League on the whole does a good job representing the interests of its membership, in this instance I believe that little debate and even less input has been solicited by the League on behalf of those it represents. Representation of member interests is just as important as is preserving the long and rich traditions of the amateur service. I am therefore opposed to the ARRL proposal which seeks to regulate the amateur radio spectrum in terms of signal bandwidths rather than in terms of emission type (mode), for the following reasons:

1) Regulation by bandwidth will cause widespread confusion among amateur radio operators as well as monitoring stations as they attempt to determine the bandwidth of their transmissions, which would in turn dictate which part of the bands they should transmit in. Most amateurs do not own or have access to spectrum analyzers for proper discernment of the band width of the emission mode. While the ARRL proposes, separate band regions for signals of bandwidth 200 Hz versus 500 Hz, amateurs transmitting in CW may only know the approximate bandwidth occupied by their emitted signal, and would not be sure if they should be in the 200 Hz segment or the 500 Hz segment. This is not a problem under the current rule, where amateurs ostensibly stay within the CW segments. Precise measurements of emitted bandwidth would be especially difficult for amateurs who build their own equipment, be said equipment solid state QRP or vacuum tube transmitters. Enforcing regulations by precise bandwidths would therefore be an impractical regulatory nightmare with the potential to penalize reasonable law-abiding amateur radio operators.

2) The U.S. Amateur Bands as defined by the FCC and international law already provide adequate flexibility to accommodate future and experimental digital modes. While the ARRL feels that this flexibility is currently inadequate, this has not been my experience. The increased use of digital modes has not in any observable way put undue hardship or burden upon those who operate said modes. In reality the preponderance of activity on the amateur bands is not digital but phone operation. Phone conversations are significantly more vulnerable to interference, intentional or otherwise, than the digital modes, yet in the current proposal little or no protection is granted for these modes. While the digital modes arguably have a place in the amateur service, the very parlance of Part 97 that assures protection under the current band plan. In Part 97 the regulated modes are identified as "data", "phone", and "image". Understandably these terms are general enough so as to offer wide latitude for the development of new and experimental modes, and indeed such experimentation is explicitly encouraged by Part 97. Incompatibilities that cause interference between modes can be worked out through simple revisions of the ARRL "band plans", without the need for FCC rulemaking.

3) The ARRL proposal to regulate amateur frequency use according to bandwidth offers no advantages over current method of regulation by mode. Indeed it could and should be argued that regulation by mode already accomplishes a de facto regulation by bandwidth, albeit not a readily regulation. Modes such as SSB, CW or AM each expressly convey distinctly different bandwidths that are commonly used with these modes. CW requires less bandwidth (a nominally agreed upon 500 Hz) than SSB (nominally 2.8 kHz), for example, and good amateur practice already dictates using only the amount of bandwidth and power necessary to complete the contact on a given mode. While the current ARRL "band plans" are gentleman's agreements about which modes should be used in the various parts of the amateur spectrum. Hence I don't see any advantage at this time to disturbing the status quo and system which has been in place for decades.

In light of the aforementioned observations, I therefore respectfully ask that the proposed rulemaking be set aside the status quo be maintained until such it can be conclusively proven that a need for change does exist. Then and only then such change should be most thoroughly debated and discussed within the amateur community so the rights and privileges of those who operate all modes, phone, CW and digital are considered.

Respectfully submitted,
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